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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996	)	
	)	CC Docket No. 96-128
Petition To Extend Limited Waiver To Implement FLEX ANI	)	
	)	

PETITION TO EXTEND LIMITED WAIVER TO IMPLEMENT FLEX ANI BY SOUTHWESTERN BELL TELEPHONE COMPANY, PACIFIC BELL, AND NEVADA BELL

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SUMMARY

In its March 5, 1998 letter to the Commission's Common Carrier Bureau, Southwestern Bell Telephone Company ("SWBT"), Pacific Bell, and Nevada Bell (collectively "SBC") identified the need for waivers concerning seven technological problems that prevented SBC from passing FLEX ANI on certain switches or call types.[1] The Commission granted an indefinite waiver for one of the problems (Feature Group B) and a 90 day waiver for the others.

After the Commission granted the 90-day waiver, SBC continued coordinating with vendors and working diligently on the problems. By June 9, 1998, SBC expects to have resolved three of the problems, including the most significant. Resolving the remaining three problems is beyond SBC's control since their resolution requires feature development by switch vendors and standards changes. Accordingly, we request waiver extensions for the three remaining problems: (1) 0- transfer calls from 6 DMS 200 TOPS switches; (2) 800-type Database Services (*e.g.*, 800, 888, 877) calls routing to POTS phone numbers; and (3) 800-type Database Services calls at tandem switches. These three remaining problems affect calls from "smart" and "dumb" payphones in the same way.

[1] March 5, 1998 letter to Rose Crellin, Enforcement Division, Common Carrier Bureau, from Jeffrey B. Thomas, SBC, in CC Docket No. 96-128.

The following chart summarizes the waiver extensions needed by Southwestern Bell Telephone Company ("SWBT"), Pacific Bell ("PB"), and Nevada Bell ("NB") for the three remaining specific technological problems that prevent passage of FLEX ANI on certain types of calls:

Problem	Company	% of Payphone Calls Affected[2]	Waiver Requested Until[3]
1. 0- transfer calls from DMS 200 TOPS switches – 6 switches only	PB	<1/7%	8/15/98
2. 800-type Database Services (*e.g.*, 800, 888, 877) calls routing to POTS phone numbers	SWBT PB NB	<1%	10/9/2000
3. 800-type Database Services calls at tandem switches	SWBT PB NB[4]	<1/10%[5]	10/9/2000

[2] These are estimates because actual numbers are not available.
[3] If we can implement FLEX ANI earlier, we intend to do so.
[4] The problem affects a larger percentage of payphone calls in Nevada Bell's territory, but Nevada Bell provides far fewer payphone lines than SWBT or Pacific Bell.
[5] This approximate percentage is for payphone calls directly connected to SWBT's, Pacific Bell's, or Nevada Bell's networks. It does not include payphones connected to independent LECs' and CLECs' networks where the independent LECs and CLECs interconnect to SWBT's, Pacific Bell's, or Nevada Bell's tandem switches. We do not know what approximate percent of those payphone calls are affected.

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Southwestern Bell Telephone Company ("SWBT"), Pacific Bell, and Nevada Bell (collectively "SBC") submit this Petition to extend, for three specific technological problems, their limited waiver to implement flexible automatic number identification ("FLEX ANI"). The Commission granted the current waiver in its March 9, 1998 *Memorandum Opinion and Order* ("*FLEX ANI Order*") in this proceeding. In the *FLEX ANI Order*, the Commission granted SBC and certain other LECs "a 90 day waiver to resolve technical and other implementation problems with specific switch types and some call types."[6] The 90-day waiver expires on June 9, 1998. For SBC, the 90-day waiver applied to six technological problems. As we had explained in earlier filings, resolution of the problems depended on the development of new standards and/or

[6] *FLEX ANI Order* at para. 71.

vendor solutions and was, thus, beyond SBC's control. We explained that resolution of some of the problems would take from several months to a few years.[7] Despite our best efforts in working with vendors and standards bodies, three of the problems cannot be resolved by June 9, 1998. SBC requests waiver extensions for the three remaining problems: (1) 0- transfer calls from 6 DMS 200 TOPS switches; (2) 800-type Database Services (*e.g.*, 800, 888, 877) calls routing to POTS phone numbers; (3) 800-type Database Services calls at tandem switches. These three remaining problems affect calls from "smart" and "dumb" payphones in the same way.

I. BACKGROUND

In its March 5, 1998 letter to the Commission's Common Carrier Bureau, SBC identified the need for waivers concerning seven technological problems that prevented SBC from passing FLEX ANI on specific switches or call types.[8] The Commission granted an indefinite waiver for one of the problems (Feature Group B) and a 90 day waiver for the others.

After the Commission granted the 90 day waiver, SBC continued to coordinate with vendors and to work diligently on the problems. By June 9, 1998, SBC expects to have resolved three of the problems, including the most significant. Two problems are

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[7] October 1, 1997 letter to John B. Muleta, Common Carrier Bureau, from Jeffrey B. Thomas, SBC, in CC Docket No. 96-125; October 30, 1997 Comments of SWBT, Pacific Bell, and Nevada Bell, CC Docket 96-125; January 23, 1998 letter to Rose Crellin, Common Carrier Bureau, from Jeffrey B. Thomas, SBC, CC Docket No. 96-128; March 5, 1998 letter to Rose Crellin, Enforcement Division, Common Carrier Bureau, from Jeffrey B. Thomas, SBC, in CC Docket No. 96-128.

[8] March 5, 1998 letter to Rose Crellin, Enforcement Division, Common Carrier Bureau, from Jeffrey B. Thomas, SBC, in CC Docket No. 96-128.

resolved as of this filing: (1) FLEX ANI on calls received over Equal Access Operator Services Signaling ("EAOSS") trunk groups from DMS end offices and (2) FLEX ANI calls received from Ericsson 10 switches with indirect trunking. The most significant problem, affecting 7 to 9 percent of all payphone calls, was FLEX ANI 800-type Database Services calls routing to carrier identification codes ("CICs"), on FGD or using GR-394 signaling, on DMS switches. SBC worked with NORTEL to expedite a solution. Based on NORTEL's expedited schedule for necessary software patch releases (NORTEL patch #TFS01 in NTS00025 feature), this problem is scheduled to be resolved prior to June 9, 1998.

Resolution of the three remaining problems is beyond SBC's control and cannot be completed by June 9, 1998. The first of the remaining problems described below is 0- transfer calls on six DMS 200 TOPS switches. The solution to this problem depends on NORTEL's expedited implementation schedule, which provides for resolution of the problem for all except six switches in Pacific Bell's territory by June 9, 1998. NORTEL has scheduled the additional six switches to be completed by August of 1998. Resolution of the other two remaining problems, 800-type Database Services calls to "plain old telephone service" ("POTS") numbers and 800-type Database Services calls at the tandem switch, depends on the creation of industry standards and subsequent vendor feature development. We have been working with standards bodies and vendors on the problems. Despite our best efforts, the three problems cannot be resolved by June 9, 1998, and SBC requests waiver extensions for the three remaining problems.

II. THE NATURE OF THE EFFECTS OF THE THREE REMAINING PROBLEMS

The practical effect of the three remaining problems is limited to specific types of payphone calls and does not affect a payphone's ability to send FLEX ANI on other call types. Thus, the problems do not affect SBC's installation of FLEX ANI in all its switches.

The affected calls are a very small percentage of all compensable payphone calls. However, the effect is not limited to any particular PSP. Instead, the problems occur with respect to limited types of calls from any payphone, whether an SBC payphone or that of a third party, directly connected to one of SWBT's, Pacific Bell's, or Nevada Bell's networks. In addition, the second and third problems (involving 800-type Database Services calls at the tandem switch) affect an unknown percentage of the limited types of calls from payphones directly connected to an independent LEC's network that, in turn, interconnects at SWBT's, Pacific Bell's, or Nevada Bell's tandem switches.[9]

These problems have no affect on the IXCs' abilities to pay per call compensation on the vast majority of compensable calls. Because the problems do not prevent payphones from passing FLEX ANI, IXCs can receive FLEX ANI for use in paying per call compensation on all calls except the limited types affected by the three problems. These problems would not interfere with Congress' mandate, and the

[9] The Commission should expressly recognize that the problems affect third-parties (PSPs, ILECs, and CLECs), and that SBC is not responsible for these effects since they are beyond SBC's control.

Commission's rules, to ensure "that all payphone service providers are fairly compensated for each and every intrastate and interstate call using their payphone...." Compensation can be made based on use of the LEC-provided ANI lists on a per-call basis, or based on per phone compensation on the phones that are served by the switches described below that are affected by the problems. In addition, the calls affected by the three remaining problems are deminimous.

III. SBC's WAIVER EXTENSION REQUEST

The following chart summarizes our need for waiver extensions for the three remaining specific technological problems:

Problem	Company	% of Payphone Calls Affected[10]	Waiver Requested Until[11]
1. 0- transfer calls from DMS 200 TOPS switches – 6 switches only	PB	<1/7%	8/15/98
2. 800-type Database Services (*e.g.*, 800, 888, 877) calls routing to POTS phone numbers	SWBT PB NB	<1%	10/9/2000
3. 800-type Database Services calls at tandem switches	SWBT PB NB[12]	<1/10%[13]	10/9/2000

[10] These are estimates because actual numbers are not available.
[11] If we can implement FLEX ANI earlier, we intend to do so.
[12] The problem affects a larger percentage of payphone calls in Nevada Bell's territory, but Nevada Bell provides far fewer payphone lines than SWBT or Pacific Bell.
[13] This approximate percentage is for payphone calls directly connected to SWBT's, Pacific Bell's, or Nevada Bell's networks. It does not include payphones connected to independent LECs' and CLECs' networks where the independent LECs and CLECs

The following discussion describes the three problems, including their approximate size and likely duration:

1. **0- Transfer Calls From DMS 200 TOPS Switches – 6 Switches Only**

a) The Problem:

The "0- transfer" FLEX-ANI problem occurs when a customer dials "0" (without any additional numbers) and gets a Traffic Operator Position System ("TOPS") operator via a DMS 200 TOPS switch. The calling customer then requests that the call be transferred to a carrier that participates in SWBT's or Pacific Bell's 0- transfer service. These calls can arrive at the TOPS switch transmitting FLEX ANI information integers ("ii") of "07", "27", "29" or "70"; however, the TOPS switch currently can only enter one set of ANI ii in the outgoing table. If the incoming ANI ii pair is the same as the pair in this table, the ANI ii pair is sent forward. Any other incoming ANI ii pair, however, results in an ANI ii pair of "00" being sent forward on the outgoing call. For instance, if the TOPS facilities manager puts "07" as the supported ANI ii code, then all incoming calls with "07" will be forwarded to the carrier with an ANI ii of "07". All incoming calls with any other ANI ii, including "27" integers on a "smart" coin line, will have the ANI ii stripped, and the ANI ii "00" will be sent to the carrier. Calls from "smart" and "dumb" payphones are affected in the same way.

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interconnect to SWBT's, Pacific Bell's, or Nevada Bell's tandem switches. We do not know what approximate percent of those payphone calls are affected.

b) The Size Of The Problem:

At the time that the Commission granted the 90-day waiver, SWBT and Pacific Bell had this 0- transfer FLEX-ANI problem in all of their 46 DMS 200 TOPS switches. SWBT has resolved the problem in all its TOPS switches. Based on NORTEL's current schedule for generic software releases, Pacific Bell will be able to resolve the problem in all but six of its switches by June 9, 1998. Pacific Bell estimates that the percentage of all payphone calls that will continue to be affected by this problem after June 9, 1998, is less than 1/7 of 1%. Nevada Bell does not have a TOPS-Switch FLEX-ANI problem because Nevada Bell does not offer the 0- product.

c) The Duration Of The Problem:

In 1997, SBC purchased 2-digit ANI software (ENSVOOO6) for TOPS switches and installed it. During testing of the capability, however, we discovered the deficiency in the software for 0- calls. SBC contacted NORTEL about this problem and provided NORTEL with design requirements to resolve it. NORTEL and other switch vendors generally operate on an approximately 18 to 24 month schedule for new software releases. A request from a carrier for a new feature and for expedited treatment must compete with the numerous other requests that the switch vendor is continually receiving.

NORTEL responded to SBC that it expected the FLEX ANI feature containing the solution to be available for TOPS as order code OSEA0012 in the LET0010 software release, which will not be available until December 1998. NORTEL said that it would expedite a solution by bridging the new feature back to earlier TOPS releases but that it could only bridge it back to LET006 without losing quality. SBC still had some

TOPS switches at the earlier LET004 release in Pacific Bell. Accordingly, SBC requested a waiver from the Commission until December 15, 1998 so that it could obtain the software to fix this problem in all the switches. In response, the Commission instead granted the waiver until June 9, 1998. SBC again requested an expedited solution from NORTEL. SBC's switches at LET004 were being upgraded to LET007, following the local number portability deployment schedule. Since the NORTEL LET007 load dates for six switches in Pacific were beyond the June 9, 1998 waiver time frame, we worked with NORTEL to obtain the best schedule we could, without losing quality or jeopardizing other required projects.[14] We obtained a faster schedule for those six switches. The LET007 load dates for the six switches, however, are still beyond the June 9, 1998 waiver date:

Switch	Original Expedited Date	New Expedited Date
Bakersfield 76T	7/14/98	6/25/98
Chico 88T	8/04/98	7/14/98
Redding 25T	8/12/98	7/22/98
Salinas 02T	8/20/98	8/06/98
San Luis Obispo 02T	8/18/98	7/30/98
Stockton 27T	7/21/98	6/16/98

[14] NORTEL indicated that the only way it potentially could meet the June 9, 1998 waiver date in these six switches would be to remove everything from the LET007 implementation except the software load itself. This would require leaving out hardware associated with these loads that is needed for local number portability ("LNP") and for trunking growth and switch capacity increases required to meet demands from competitive LECs and others. For instance, LNP introduces additional work-loads for the switch processors which require processor hardware upgrades. Upgrading the software so that the switch can do more work without upgrading the processor to meet the demands of the additional work could put the switch and new jobs such as LNP in jeopardy, thereby providing lower quality of service to the end-user customer. Pacific Bell, of course, rejected this approach.

Once the new software is loaded, Pacific Bell intends to apply the FLEX ANI feature within 24 hours, and then activate it. Therefore, SBC expects to have all its TOPS switches passing FLEX ANI on 0- calls by August 8, 1998. We are requesting a waiver for this problem until August 15, 1998 in order to provide time for testing and evaluation of service.

2. <u>800-type Database Services Calls Routing To POTS Phone Numbers</u>

a) The Problem:

On all switches (end office and tandem) performing the Service Switching Point ("SSP") functionality, the original FLEX ANI ii integers cannot be passed on 800-type Database Services (e.g., 800, 888, 877) calls routing to "plain old telephone service" ("POTS") phone numbers. This problem affects our own intraLATA 800 services, just as it does the 800 services of other carriers. The problem also affects the passage of "27" integers on "smart" coin lines, just as it does FLEX ANI codes on "dumb" lines.

The original FLEX ANI ii integers are lost in the process of querying the 800 database. In this process, for all outgoing 800-type Database Services calls, the end office switch launches a query to the 800 data base. If the 800 data base has a POTS routing number, rather than a carrier identification code ("CIC"), the telephone number is returned and the SSP replaces the original FLEX ANI ii integers with the integers "24" in order to identify the call as an 800-type call. Thus, the receiving carrier will not be able to determine if the call originated from a payphone.

b) The Size Of The Problem:

We estimate that the 800-type Database Services calls routing to POTS problem affects less than 1% of payphone calls. This estimate is based on calculations of

SWBT traffic and a reasonable belief that the relative size of the problem is approximately the same size for Pacific Bell and Nevada Bell as for SWBT.

c) The Duration Of The Problem:

The current replacement of the FLEX ANI integers with "24" is an industry standard on all switch types to 1) indicate an 800 call, 2) generate the routing to the POTS number, and, as a result, 3) create the correct Automatic Message Accounting ("AMA") record. Discussions have taken place with Bellcore regarding potential standards solutions to the problem. Moreover, Pacific Bell submitted this issue to the Industry Numbering Committee ("INC"), which is a subcommittee of the Alliance for Telecommunications Industry Solutions ("ATIS") forum. The issue is being worked by the ANI Task force. The issue title is "ANI ii for Payphone Compensation" and has been assigned the issue number 139. Pacific Bell recommended that the process move forward to establish three new ANI ii digit pairs. These codes would essentially "mirror" the existing 27, 29, and 70 codes, with the added feature of identifying that the call is toll free and translated as POTS routable as well as originating from a payphone. These new codes would be added to the ANI ii codes. We also anticipate the need for work in the T1 Standards Committee. Whether full standards work will be required will depend on whether the vendors find that there is a need to alter the existing software in the switches at the SSP to accommodate the three new codes.

The switch development process requires work and consensus in both industry forums and standards forums and then requires vendor development. The entire process normally takes a minimum of three to five years for completion, even where there is broad industry support and demand for the change. Industry support is needed

to move an item to the top of the list of standards proposals. If full standards work is not required, Bellcore may be able to accommodate the new applications and need for vendor uniformity by changing its Generic Requirements ("GRs") documents. This can take less time than full standards changes, but may require at least nine months if funding can be obtained, and the funding parties can reach agreement. Once the standard is changed, the switch vendors must create new features (requiring generic software releases) based on the new requirements. Vendors normally work on approximately an 18 to 24 months schedule (*i.e.*, they usually need at least 18 months lead-time on requests because of the volume of requests). Subsequent company-wide switch translations take about six months. The specific timing and potential escalation of software releases again depends on industry demand for the new release since each request must compete with other requests to get to the top of the list. Therefore, development of the standard, development of the feature by the vendor, and LEC work required to load and activate a new feature are estimated to take three to five years, if industry support develops for a new standard, but the time may be reduced somewhat if the Bellcore GR revision process is sufficient for resolving this problem and vendors expedite their schedules. Accordingly, SBC requests an extension until October 9, 2000, to attempt to fix this FLEX ANI problem.

3. **800-type Database Services Calls At Tandem Switches**

a) The Problem:

SWBT's, Pacific Bell's, and Nevada Bell's access tandem switches do not have the capability to identify whether or not IXCs are ready to receive FLEX ANI integers. Thus, on those calls where the 800 database look-up is performed at the access tandem, rather than the end office, no screening can occur to determine whether or not to send FLEX ANI integers. Calls are handled improperly in those cases where the IXC is not prepared to receive the appropriate integers. This problem affects calls from "smart" and "dumb" payphones in the same way.

At the vast majority of our end offices, the NORTEL, Lucent and Ericsson FLEX ANI feature provides the ability to screen calls that are directed to IXCs. Calls originated from end offices with FLEX ANI are screened so that IXCs who do not want to receive FLEX ANI integers receive the standard ANI integers associated with the line type and call type. This screening functionality occurs where IXCs are connected directly to end offices.

SBC's access tandems perform the SSP functionality (800 database lookup) for a few non-SSP capable end offices and for ILECs and CLECs. Once IXC ownership and routing is determined, an attempt is made to send the call to the IXC. The access tandem switches do not have the capability to distinguish those IXCs ready to receive FLEX ANI integers from those IXCs not ready to receive FLEX ANI integers. If the IXC switches have been prepared to receive FLEX ANI integers, the call will be processed properly. If, however, the IXC switches are not prepared to receive the appropriate FLEX ANI integers, the call will not be handled properly.

b) The Size Of The Problem:

We estimate that this problem affects less than 1/10 of 1 percent of the combined calls from payphones directly connected to SWBT's, Pacific Bell's, and Nevada Bell's network. The problem affects calls from "smart" and "dumb" payphone lines the same way. The problem affects a significantly higher percentage of payphone calls in Nevada Bell's territory because Nevada Bell has a number of DMS10 end offices that cannot launch their own 800 data base queries. Nevada Bell, however, provides far fewer payphone lines than SWBT and Pacific Bell and, thus, does not significantly affect the overall size of the problem as a percentage of payphone calls. The problem also occurs on an unknown percentage of calls from payphones connected to the networks of independent LECs and competitive LECs who in turn use SWBT's, Pacific Bell's, or Nevada Bell's access tandems for 800 database lookups.

c) The Duration Of The Problem:

To solve the problem, screening functionality may be needed at the access tandem which mimics the screening functionality at the end offices. The full range of acceptable FLEX ANI assignments must have the ability to default to standard line type and call type ANI integers.

Because solving the problem requires standards development (involving ILECs, CLECs, switch vendors, IXCs, Bellcore, and others) and subsequent vendor development of the new feature, the steps and time required to solve the problem are likely to be similar to those required for problem two above concerning 800-type

Database Services calls routed to POTS numbers.[15] Even if it turns out that the full standards development process is not needed, and vendors expedite their schedules, a minimum of approximately two to three years is likely to be needed. In addition, conversion of Nevada Bell's DMS10 offices, which cannot perform the screening, to DMS100 offices, which can perform the screening, will not occur until at least late in the year 2000. Accordingly, we request a waiver extension until October 9, 2000.

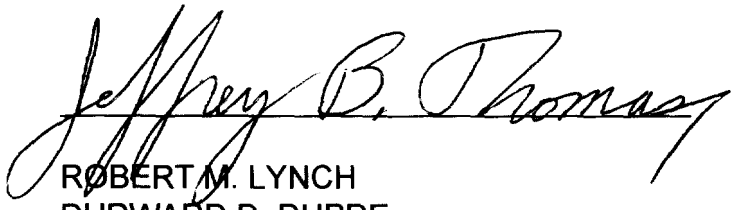
[15] We have considered "work-arounds" under which calls might be redirected from access tandems or end offices that are incapable of performing the screening to end offices that are capable. This would require re-engineering our network, including conversion of end offices to tandem-like offices, at great expense and with decreased efficiency. We also believe that in many or all cases this "work-around" currently would be technically infeasible and require vendor and, potentially, standards work. For instance, we do not believe that sending 800 calls to an end office via the access tandem in 4ESS offices is currently technically feasible. The 4ESS software has not been developed for this type of call handling. Finally, a "work-around" solution could disrupt our contracts with other carriers that require the routing of traffic through our tandems.

IV. CONCLUSION

For all the above reasons, the Commission should grant SWBT's, Pacific Bell's, and Nevada Bell's petition to extend their limited waiver to implement FLEX ANI for the three remaining technological problems.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY
PACIFIC BELL
NEVADA BELL



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